

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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|-------------------------------|------------|-----------------------|
| LISA BARBOUNIS | : | CIVIL ACTION |
| | Plaintiff, | NO. 2:19-cv-05030-JDW |
| -vs- | : | |
| THE MIDDLE EAST FORUM, et al. | : | |
| | : | |
| Defendants. | : | |

**COUNTERCLAIM DEFENDANT, LISA
BARBOUNIS'S FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS ADDRESSED TO COUNTERCLAIM PLAINTIFF,
THE MIDDLE EAST FORUM AND GREG ROMAN AND DANIEL PIPES**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Counterclaim Defendant, LISA BARBOUNIS'S, by and through undersigned counsel, hereby propounds her First request for Production of Documents Addressed to The Middle East Forum. Counterclaim Plaintiff is hereby requested to respond under oath, within thirty (30) days of the date of service.

INSTRUCTIONS

The following instructions are to be considered applicable to this request with respect to each document sought herein:

1. ORIGINAL DOCUMENTS

In producing these documents, you are requested to produce originals, not copies, of the documents requested. You are also requested to furnish all documents known or available to you, regardless of whether these documents are held or produced directly by you or your agent, employees, representatives, investigators, partners, or by your attorneys or their agents, employees, representatives or investigators. The documents which are

sought by this request for production shall include not only those documents which are in the dominion or control of yourself, or your representatives or agents, but also those which are held by anyone on your behalf, and not merely such documents as are known to you of your own personal knowledge.

2. ELECTRONIC DOCUMENTS

When a document in electronic form is responsive to this discovery request, please produce such other information about the format in which the document is stored and the program that created it so that the document may be meaningfully opened, read, and used.

3. COPIES

If a document was prepared in several copies, or if additional copies were thereafter made, and if such copies are not identical or are no longer identical by reason of subsequent notations or modifications of any kind whatsoever, including without limitation, notations on the front and the back of the pages thereof, then each such non-identical copy is a separate document and must be produced.

4. PRIVILEGES

In the event that you seek to withhold any documents on the basis that it is properly entitled to limitation of discovery, or is subject to a Insurance Policy of privilege, please identify each such document withheld by providing the following information:

- a. The date of the document;
- b. The subject to which the document relates;
- c. The author of the document, and the author's address;
- d. The name of the recipient, addressee, or party for whom such document was intended, and the name of all other persons to whom the document or copies thereof

were furnished, as well as those to whom it, or copies thereof, became available at any time, together with the job title and address of each person so identified; and,

- e. The basis for the Insurance Policy or privilege. If you assert a privilege as to any portion of any categories of materials described herein, please produce the remainder of that category as to which you do not assert a privilege.

5. LOST DOCUMENTS OR THINGS

If you have any knowledge of any document called for by this discovery request that was at one time, but is no longer in your possession, custody, or control, identify each such document and state whether it is:

- a. Missing or lost, destroyed or transferred voluntarily or involuntarily to others, and if so, to whom; or how otherwise disposed of; and,
- b. For each such instance, explain the circumstances surrounding the authorization for such disposition; the person authorizing such disposition; and the date of such disposition.

6. SUPPLEMENTING THE PRODUCTION

This request shall be deemed continuing so as to require prompt, further and supplemental production if Respondent locate or obtain possession, custody or control of additional responsive documents at any time prior to trial herein and any and all other rules of the court having jurisdiction over this matter.

7. OBJECTION TO A DOCUMENT REQUEST

If you state an objection to a document request, please provide the documents that you contend would be within the scope of permissible discovery. If you object to part of any request to produce and refuse to answer that request, state your objection, identify the part to which you are objecting, and answer the remaining portion of the request. If you object to the scope or the time period of any request, state your objection, identify the

scope or time period to which you are objecting and answer the request for the scope or time period you believe appropriate.

DEFINITIONS

Please use the following definitions and comply with the following instructions in responding to this document request.

1. As used in this Request, the term "**document**" means, without limitation, the following items: printed, recorded or produced by mechanical or computer generated process, or written or produced by hand, and includes without limitation, handwritings, type-writings, printing, photo-stating, photographing and every other means of recording or preserving a verbatim summary or record of any form of communication or representation, including letters, words, pictures, sounds, symbols or any combination thereof and/or all transcript copies thereof; all records, reports, papers, documents, books, logs, diaries, calendars letters, notes, memoranda, agreements, communications, brochures, correspondence, telegrams, computer diskettes, copies of computer diskettes, computer print-outs in any form, summaries of records of telephone conversations, summaries of records of meetings or conferences, summaries of reports of investigations, paste-ups, lay-outs, mock-ups statements, receipts, invoices, records of account and other writings.
2. The terms "**refer or relating to**" mean connected with, reflecting, having an association with, depicting, illustrating, discussing, mentioning or otherwise having some direct or indirect relation to the allegations contained in Claimant's Complaint in this matter.
3. "**You**" shall mean and include Respondents their agents, representatives and employees.
4. "**Plaintiff**" shall mean the Plaintiff in this action.
5. The "**Employer**" means the employer of Lisa Barbounis during the time period of time outlined in the Civil Action Complaint; when Lisa worked at THE MIDDLE EAST FORUM . Accordingly, the word "employer" for the purposes of these Requests for Production of Documents refers to Defendant, THE MIDDLE EAST FORUM .

5. "**Correspondence**" means any Document Concerning the transmittal of information.
6. "**Department of Labor**" means the United States Department of Labor, its officers, agents, and representatives.
7. "**Agreements**" shall mean agreements, contracts, arrangements, mutual promises, accords, engagements or undertakings.

DOCUMENTS REQUESTED

1. Any and all documents upon which the Counter Claim is based. This includes all documents that support your allegations that Lisa Barbounis stole money from The Middle East Forum.
2. Paragraph 2 of the Counter Claim filed against Lisa Barbounis states:

“As MEF has long suspected, and as the evidence has now revealed, in 2018, Barbounis, a married woman and mother of young children, hatched a plan to emigrate to the United Kingdom to start a new life with a man named Daniel Thomas, whom she met through her work at MEF, and with whom she soon after began a sexual affair.”

Accordingly, please produce any and all documents that support these allegations including but not limited to any and all documents upon which the contention is based that Lisa Barbounis “hatched a plan to emigrate to the United Kingdom.”

3. Paragraph 3 of the Counter Claim filed against Lisa Barbounis states:

“Apparently motivated by her desire to move to the United Kingdom and pursue her relationship with Thomas, Barbounis developed a conspiracy to pay for this scheme by diverting MEF funds to Thomas, by using MEF funds and resources to travel to the United Kingdom and Europe to spend time with Thomas, and ultimately, by levying sexual harassment and assault allegations against MEF and its director, Gregg Roman (“Roman”) in the hopes that such allegations would lead to a large financial settlement that would fund her new life in the United Kingdom. See Exhibit A.”

Accordingly, please produce any and all documents that support these allegations including but not limited to any and all documents upon which the contention is based that Lisa Barbounis “divert[ed] MEF funds to Thomas, by using MEF funds and resources to travel to the United Kingdom and Europe to spend time with Thomas...”

4. Paragraph 4 of the Counter Claim filed against Lisa Barbounis states:

“As her relationship with Thomas fell apart and her scheme was at risk of being revealed to MEF and others, Barbounis resorted to an extended campaign of threats against Jazmin Bishop (“Bishop”), Thomas’s girlfriend, fiancée, or wife and the mother of his children, even invoking the power of the office of her current employer, Congressman Randy Weber, in an effort both to preserve her adulterous relationship with Thomas and to ensure that her illegal diversion of MEF funds to Thomas would remain hidden.”

Accordingly, please produce any and all documents that support these allegations including but not limited to any and all documents upon which the contention is based that Lisa Barbounis “...resorted to an extended campaign of threats against Jazmin Bishop (“Bishop”), Thomas’s girlfriend, fiancée, or wife and the mother of his children, even invoking the power of the office of her current employer, Congressman Randy Weber, in an effort both to preserve her adulterous relationship with Thomas and to ensure that her illegal diversion of MEF funds to Thomas would remain hidden”

5. Paragraph 6 of the Counter Claim filed against Lisa Barbounis states:

“Having finally uncovered the evidence of Barbounis’ unlawful conduct, MEF now seeks, through these counterclaims, to begin the process of repairing the damage she has caused.”

Accordingly, please produce any and all documents that support that allegation that MEF has “uncovered evidence of Barbounis’ unlawful conduct...” This includes but is not limited to all such evidence referred to in this paragraph of the Counterclaim.

6. Paragraph 10 of the Counter Claim filed against Lisa Barbounis states:

“Barbounis and Roman quickly developed a friendly working relationship, and Barbounis liberally shared details of her personal life with Roman, including the most intimate information about her health, her emotions, her marriage, and her children.”

Accordingly, please produce any and all documents that support that allegations is this paragraph that Lisa Barbounis and Greg Roman “quickly developed a friendly working relationship, and Barbounis liberally shared details of her personal life with Roman, including the most intimate information about her health, her emotions, her marriage, and her children.”

7. Paragraph 13 of the Counter Claim filed against Lisa Barbounis states:

“Barbounis often engaged in playful banter with Roman via text message, often using flirtatious language and emoticons, and calling him “baby.” Id.”

Accordingly, please produce any and all documents that support that allegations is this paragraph including but not limited to all documents confirming that Lisa Barbounis referred to Greg Roman as “baby.”

8. Paragraph 13 of the Counter Claim filed against Lisa Barbounis states:

“Barbounis often engaged in playful banter with Roman via text message, often using flirtatious language and emoticons, and calling him “baby.” Id.”

Accordingly, please produce any and all documents that support that allegations is this paragraph including but not limited to all documents confirming that Lisa Barbounis referred to Greg Roman as “baby.”

9. Please produce any and all electronic communications between Lisa Barbounis and Greg Roman including messages sent through applications like Whats App and Telegram, SMS, text messages, instant messages, and emails.

10. Please produce any and all electronic communications between Lisa Barbounis and Daniel Pipes including messages sent through applications like Whats App and Telegram, SMS, text messages, instant messages, and emails.

11. Please produce any and all electronic communications between Lisa Barbounis and Mark Fink including messages sent through applications like Whats App and Telegram, SMS, text messages, instant messages, and emails.

12. Paragraph 15 of the Counter Claim filed against Lisa Barbounis states:

“At the same time, MEF and Roman were planning to start a social welfare entity separate and apart from MEF and shared his plans with Barbounis, who volunteered to assist him with the founding of this 501(c)(4) organization.”

Accordingly, please produce any and all documents that support the allegations in this paragraph.

13. Paragraph 16 of the Counter Claim filed against Lisa Barbounis states:

“In response to this offer, on July 12, 2018, Barbounis sent Roman a list of items that he would need for creating a 501(c)(4) organization.”

Accordingly, please produce any and all documents that support the allegations in this paragraph.

14. Paragraph 17 of the Counter Claim filed against Lisa Barbounis states:

“On July 26, 2018, Barbounis communicated with Ari Morgenstern, Director of Communications and Policy for the Christians United for Israel, and informed him of Roman’s plans to start a new social welfare organization.”

Accordingly, please produce any and all documents that support the allegations in this paragraph.

15. Paragraph 18 of the Counter Claim filed against Lisa Barbounis states:

“In August 2018, Roman authorized MEF’s attorneys and representatives to speak with Barbounis about the new organization.”

Accordingly, please produce any and all documents that support the allegations in this paragraph.

16. Paragraph 20 of the Counter Claim filed against Lisa Barbounis states:

“Simultaneously, Barbounis was competing with her coworker, Marnie Meyer, for status and power within MEF.”

Accordingly, please produce any and all documents that support the allegations in this paragraph.

17. Paragraph 21 of the Counter Claim filed against Lisa Barbounis states:

“Barbounis complained to Roman when she found out that Meyer might get an assistant before Barbounis: “Is it the assistant thing? She said you promised her Delaney and she will be pissed if someone gets an assistant before her. Her and I have been getting along pretty well, or so I thought, so I’m rather shocked to hear she was shooting down having my role modified. you are my boss and she is HR. How is it that she gets to make performance judgments? I know we are a small place but we need structure. I want to make my time here successful for both me and MEF. I want to live up to my potential. I know you can help me achieve that. How ‘can we fix this?’”. See Exhibit C.”

Accordingly, please produce any and all documents that support the allegations in this paragraph.

18. This document request specifically refers to “Exhibit C” of the Counterclaim filed by The Middle East Forum which is referred to in Paragraph 21 of the Counterclaim. Exhibit C is an incomplete document which is difficult to read. Please produce the entire conversation in a format that is readable. Please include in the production all conversations held within a 24 hour period before and after the text messages identified in Exhibit C. Please also produce the information in a format where the date and time of the text messages are discernible.

19. Defendant's Counterclaim includes an Exhibit A (Document 53-1), which is purportedly a conversation between Daniel Thomas, Greg Roman, Sidney Gold, and others. This Exhibit A is referred to in paragraphs of the Counterclaim (Document 53) including but not limited to paragraphs 3, 34, 54, 74, and 78 of the Counterclaim. This appears to be an incomplete document. It begins with Daniel Thomas stating "involvement with us." Moreover, there are sections labeled "cross talk." Please produce the complete document including all aspects of the conversation from the time the conversation began until its conclusion.
20. Please produce any and all documents indicating, memorializing, describing, documenting communications between Daniel Thomas and The Middle East Forum. This includes all individuals who communicated with Daniel Thomas while acting on behalf of The Middle East Forum including but not limited to Greg Roman, Daniel Pipes, Mark Fink, Sidney Gold, Dave Walton, Bill Reiser and any other attorney acting on behalf of The Middle East Forum.
21. Please produce any and all documents indicating, memorializing, describing, documenting communications between Daniel Thomas and Greg Roman. This includes all individuals who communicated with Daniel Thomas while acting on behalf of The Greg Roman including but not limited to Greg Roman, Daniel Pipes, Mark Fink, Sidney Gold, Dave Walton, Bill Reiser and any other attorney acting on behalf of The Middle East Forum.
22. Please produce any and all documents indicating, memorializing, describing, documenting communications between Jazmin Bishop and The Middle East Forum. This includes all individuals who communicated with Jazmin Bishop while acting on behalf of The Middle East Forum including but not limited to Greg Roman, Daniel Pipes, Mark Fink, Sidney Gold, Dave Walton, Bill Reiser and any other attorney acting on behalf of The Middle East Forum.
23. Please produce any and all documents indicating, memorializing, describing, documenting communications between Jazmin Bishop and The Middle East Forum. This includes all individuals who communicated with Jazmin Bishop while acting on behalf of The Middle East Forum including but not limited to Greg Roman, Daniel Pipes, Mark Fink, Sidney Gold, Dave Walton, Bill Reiser and any other attorney acting on behalf of The Middle East Forum.

24. Please produce any and all documents you believe indicates, proves, or supports the allegations contained in Document 53, which is the Counterclaim.

25. Paragraph 21 of the Counter Claim filed against Lisa Barbounis states:

“Barbounis complained to Roman when she found out that Meyer might get an assistant before Barbounis: “Is it the assistant thing? She said you promised her Delaney and she will be pissed if someone gets an assistant before her. Her and I have been getting along pretty well, or so I thought, so I’m rather shocked to hear she was shooting down having my role modified. you are my boss and she is HR. How is it that she gets to make performance judgments? I know we are a small place but we need structure. I want to make my time here successful for both me and MEF. I want to live up to my potential. I know you can help me achieve that. How ‘can we fix this?’”. See Exhibit C.”

Accordingly, please produce any and all documents that support the allegations in this paragraph.

26. This document request specifically refers to “Exhibit D” of the Counterclaim filed by The Middle East Forum which is referred to in Paragraph 22 of the Counterclaim. Exhibit D is an incomplete document. Please produce the entire conversation in a format that is readable. Please include in the production all conversations held within a 24 hour period before and after the text messages identified in Exhibit D. Please also produce the information in a format where the date and time of the text messages are discernible. Please also produce this information in a format where the individuals in the conversation are identifiable, including the phone numbers to transmit the messages contained in the exhibit.

27. Paragraph 23 of the Counter Claim filed against Lisa Barbounis states:

“At the same time, Barbounis continued to share intimate medical and personal details about her life with Roman, including information about her various health concerns, and personal information about children and husband.”

Accordingly, please produce any and all documents that support the allegations in this paragraph.

28. Paragraph 24 of the Counter Claim filed against Lisa Barbounis states:

“Through October 2018, Barbounis seemed to be happy in her role at MEF and in her working relationship with Roman, and never indicated to Roman or anyone else at MEF that she had any problems or issues of any kind with Roman or anyone else at MEF, except Meyer.”

Accordingly, please produce any and all documents that support the allegations in this paragraph.

29. Paragraph 26 of the Counter Claim filed against Lisa Barbounis states:

“In the Spring of 2018, Barbounis began working on MEF’s behalf in support of Robinson.”

Accordingly, please produce any and all documents the support that allegations in this paragraph.

30. Paragraph 28 of the Counter Claim filed against Lisa Barbounis states:

“At the behest of Barbounis, MEF provided Thomas with US\$32,000 (all dollars at USD) to fund a rally to show support for Robinson, who had recently been jailed for contempt of court.”

Accordingly, please produce any and all documents that support the allegations in this paragraph and specifically include all documents that support the contention in this paragraph that the money donated as referred to in this paragraph, was donated “[a]t the behest of Barbounis...”

31. Paragraph 29 of the Counter Claim filed against Lisa Barbounis states:

“MEF entered into a contract with Thomas that detailed the methods and means by which MEF’s money would be spent and detailed the specific costs of the rally MEF would be funding. See Exhibit E.”

Please produce any and all documents, including all communications between MEF, or any employee of MEF, with Daniel Thomas in connection with Exhibit E (Document 53-1, Exhibit E). This includes all emails, or electronic messages where the contract (Exhibit E) was sent, discussed, negotiated, and/or executed. Please also include all communications indicating Lisa Barbounis's involvement in the money donated as identified in Exhibit D.

32. Paragraph 30 of the Counter Claim filed against Lisa Barbounis states:

"On or about June 8, 2018, Barbounis traveled to London with Patricia McNulty, another MEF employee, to supervise and attend the rally that MEF had funded. See Exhibit F."

Please produce any and all documents supporting the allegations in this paragraph including all documents between where Patricia McNulty and Lisa Barbounis travel to the United Kingdom was discussed, approved, confirmed, or financed. This includes but is not limited to all conversations held by email or other electronic communication between Lisa Barbounis, Patricia McNulty, and any other employee or individual acting on behalf of The Middle East Forum – in connection with the allegations in paragraph 30.

33. Paragraph 32 of the Counter Claim filed against Lisa Barbounis states:

"Almost immediately, Barbounis began an adulterous sexual relationship with Thomas."

Please produce any and all documents supporting the allegations in this paragraph and specifically include all documents that support the contention that Lisa Barbounis and Daniel Thomas began a sexual relationship during this trip.

34. Paragraph 33 of the Counter Claim filed against Lisa Barbounis states:

"Almost immediately, Barbounis began neglecting her job duties and responsibilities to MEF as she devoted substantial attention to her sexual relationship with Thomas."

Please produce any and all documents supporting the allegations in this paragraph and specifically include all documents that support the contention that Lisa Barbounis began to neglect her job duties immediately following the trip to the United Kingdom in June 2018.

35. Paragraph 34 of the Counter Claim filed against Lisa Barbounis states:

“At the time of the rally or shortly thereafter, Barbounis became aware that, of the \$32,000 provided to support the Robinson rally, Thomas had misappropriated at least \$7,000 for his own personal use.”

Please produce any and all documents supporting the allegations in this paragraph and specifically include all documents that support the contention that Lisa Barbounis became aware that Daniel Thomas “misappropriated at least \$7,000 for his own personal use.”

36. Please produce any and all documents that support the contention that Daniel Thomas misappropriated money from The Middle East Forum. Please include any and all documents that confirm the amounts of money that Daniel Tomas allegedly misappropriated, when such money was misappropriated, and the manner in which it was misappropriated.

37. Please produce any and all documents that support the contention that Lisa Barbounis was involved in any way in Daniel Thomas misappropriating money from The Middle East Forum.

38. Paragraph 35 of the Counter Claim filed against Lisa Barbounis states:

“This misappropriation of funds was not authorized or approved by MEF or Roman, who until 2020 had no idea that it had occurred because Barbounis had effectively hidden her illegal actions and threatened others who attempted to reveal her misdeeds to MEF.”

Please produce any and all documents supporting the allegations in this paragraph and specifically include all documents that support the contention that Lisa Barbounis “had effectively hidden her illegal actions and threatened others who attempted to reveal her misdeeds to MEF.”

39. Paragraph 36 of the Counter Claim filed against Lisa Barbounis states:

“Thomas used the money from MEF to help move his family into a newer home in a nicer area.”

Please produce any and all documents supporting the allegations in this paragraph.

40. Paragraph 37 of the Counter Claim filed against Lisa Barbounis states:

“Barbounis repeatedly assured Thomas that she would not tell MEF management about his misappropriation of funds.”

Please produce any and all documents supporting the allegations in this paragraph.

41. Paragraph 39 of the Counter Claim filed against Lisa Barbounis states:

“Between June 2018 and November of 2018, Barbounis traveled on several occasions to the United Kingdom to continue her affair with Thomas.”

Please produce any and all documents supporting the allegations in this paragraph. This specifically includes all documents that confirm each and every instance when Lisa Barbounis traveled to the United Kingdom and all documents that support the contention that travel was connected “to continue her affair with Thomas.”

42. Paragraph 39 of the Counter Claim filed against Lisa Barbounis states:

“On information and belief, Barbounis’ trips included but were not limited to a visit with Thomas in July of 2018.”

Please produce any and all documents supporting the allegations in this paragraph.

43. Paragraph 42 of the Counter Claim filed against Lisa Barbounis states:

“During these visits, Barbounis and Thomas would stay together in the same hotel room (sometimes unwittingly paid for by MEF), engage in sexual relations, and use illegal drugs.”

Please produce any and all documents supporting the allegations in this paragraph. Please specifically include all documents that support the contention that hotel rooms were paid for by MEF.

44. Paragraph 45 of the Counter Claim filed against Lisa Barbounis states:

“Barbounis also sent Thomas money and other resources at various times, including approximately \$1,000 in cash and a credit card that Thomas used to buy Christmas presents for his children.”

Please produce any and all documents supporting the allegations in this paragraph.

45. Paragraph 46 of the Counter Claim filed against Lisa Barbounis states:

“The source of these funds is presently unknown to MEF, but its investigation is continuing.”

Please produce any and all documents connected to the investigation identified in this paragraph that MEF plans to use at trial, or as an exhibit connected to a dispositive motion.

46. Paragraph 47 of the Counter Claim filed against Lisa Barbounis states:

“Due to Barbounis’ acute financial problems during this timeframe, including a six-figure IRS lien, MEF believes it possible that the money Barbounis sent to Thomas belonged to MEF.”

Please produce any and all documents indicating that Lisa Barbounis ever stole anything from The Middle East Forum. Please include in your production any and all documents indicating, supporting, or connected to the allegation that Lisa Barbounis stole money from MEF.

47. Paragraphs 48, 49 , 50, and 51 of the Counter Claim filed against Lisa Barbounis states:

48. During this time, Barbounis told Thomas that she was unhappy with her family life, her husband, and her job, and that she wanted to leave the United States and move to join him in the United Kingdom. *Id.*

49. Thomas reports that Barbounis confided in him that, to fund her anticipated move to the United Kingdom, she had concocted a plan to enrich herself illegally at the expense of the Middle East Forum by asserting that Roman had inappropriately pressured her to engage in sexual activity with him, and that she would make “loads” from this scheme. *Id.*

50. Thomas reports that Barbounis “wanted to leave her husband” and “come to the United Kingdom,” buy a home and continue her relationship with Thomas. *Id.*

51. Thomas reports that Barbounis told him, “I’ll say, ‘Gregg’s done this, Gregg’s done that. And then I’m going to take it to court and get, and they’ll have to pay out. They’ll pay me loads. They’ll pay me loads, and then I’ll have enough money to do whatever the hell we want to do.’” *Id.*

Please produce any and all documents other than Exhibit A, supporting any of the allegations contained in these paragraphs.

48. Paragraph 54 of the Counter Claim filed against Lisa Barbounis states:

“While in the United Kingdom, Barbounis stayed in a hotel with Thomas and continued her adulterous sexual affair with him.”

Please produce any and all documents other than Exhibit A, supporting any of the allegations contained in this paragraph.

49. Paragraph 55 of the Counter Claim filed against Lisa Barbounis states:

“Due to her many and protracted trips to the United Kingdom and her relationship with Thomas, Barbounis’ work performance at MEF began to suffer and her mistakes and errors increased, including mathematical errors involving seven-figure disparities. See Exhibit H.”

- a. Please produce any and all documents connected with Exhibit H. This includes all emails where Exhibit H was responded to or where communications connected with Exhibit were held.
- b. Please produce any and all documents indicating Lisa Barbounis' travel to the United Kingdom from June 2018 to the present.
- c. Please produce any and all documents supporting the contention that Lisa Barbounis made mistakes and errors and that these mistakes and errors increased after travel to the United Kingdom.
- d. Please include any and all documents supporting the contention that Lisa Barbounis made "mistakes and errors ... including mathematical errors involving seven-figure disparities."

50. Paragraph 56 of the Counter Claim filed against Lisa Barbounis states:

"On October 30, 2018, Barbounis and Meyer got into an argument because Meyer, at Roman's request, was documenting Barbounis' work performance failings."

Please produce any and all documents where Lisa Barbounis "work performance failings" were documented.

51. Paragraph 57 of the Counter Claim filed against Lisa Barbounis states:

"The following day, Meyer and Barbounis met to discuss these issues and, in keeping with the scheme she had divulged to Thomas, Barbounis for the first time alleged that Roman had inappropriately pressured her to engage in sexual activity with him during their trip to Israel some seven months prior."

Please produce any and all documents indicating that Lisa Barbounis first alleged "that Roman had inappropriately pressured her to engage in sexual activity with him during their trip to Israel some seven months prior" on October 31, 2018.

52. Paragraph 59 of the Counter Claim filed against Lisa Barbounis states:

“Pipes investigated the allegations raised by Meyer, including those made indirectly by Barbounis, and called a staff meeting for November 5, 2018.”

Please produce any and all documents supporting the contention that “Pipes investigated the allegations raised by Meyer, including those made indirectly by Barbounis...”

53. Paragraph 64 of the Counter Claim filed against Lisa Barbounis states:

“Pipes also informed Roman that, based in part on Barbounis’ allegations against him, he canceled his prior plan for Roman to succeed Pipes as principal and chief executive officer of MEF in 2019.”

- a. Please produce any and all documents supporting the contention “that Pipes also informed Roman that, based in part on Barbounis’ allegations against him, he canceled his prior plan for Roman to succeed Pipes as principal and chief executive officer of MEF in 2019.”
- b. This request includes all communications between Greg Roman and Daniel Pipes where Greg Roman’s position was discussed in connection with allegations of discrimination and/or harassment in the workplace.
- c. Plaintiff requests each and every communication between Greg Roman and Daniel Pipes including all electronic communications where any allegation was made by any female employee of The Middle East Forum involving sexual harassment and Greg Roman.

54. Paragraph 59 of the Counter Claim filed against Lisa Barbounis states:

“Given his newly diminished role and with MEF authorization, Roman began making plans to activate the 501(c)(4) organization that he had discussed previously with Barbounis, and began actively planning and raising money for the new organization.”

- a. Please produce any and all documents supporting the contention Greg Roman had a newly diminished role with The Middle East Forum after November 2018. This request includes all income verification statements that confirms Greg Roman’s income before and after the “newly diminished role” as alleged in this paragraph.

- b. This request also includes all documents that confirms benefits paid to Greg Roman from The Middle East Forum before November 2018 and after November 2018.
- c. This request is for any and all documents indicating in any way the manner in which Greg Roman's role with MEF was diminished after Lisa Barbounis' reports of discrimination and harassment in the workplace.

55. Paragraph 66 of the Counter Claim filed against Lisa Barbounis states:

“On November 23, 2019, Daniel Thomas’s father, Russel Thomas, wrote to Barbounis aware of the MEF funds and asking her to make this a “regular” payment. See Exhibit L.”

- a. Exhibit L is an incomplete document. Please produce the entire document in a format that is readable. Please also produce the entire conversation including all communications before and after the part of the thread produced.
- b. Please produce all documents including all electronic communications where this exhibit was provided to The Middle East Forum or some person acting on MEF’s behalf.
- c. Please produce all electronic communications with Daniel Thomas or Jazmin Bishop where information was sent to MEF or some individual acting on MEF’s behalf in connection with the claims and counterclaims in this case.

56. Paragraph 71 of the Counter Claim filed against Lisa Barbounis states:

“Despite the representation that she was not trying “to hide things” from Pipes and MEF, Barbounis was doing precisely that, as she did not disclose that Thomas had misappropriated approximately \$7,000 USD that MEF provided for the Robinson event.”

- a. Please produce all documents supporting the contentions in this paragraph and specially include all documents supporting the contention that Daniel Thomas stole money from The Middle East Forum.

57. Paragraph 72 of the Counter Claim filed against Lisa Barbounis states:

“Barbounis also consistently disregarded the admonition from Pipes that she focus on MEF work.”

a. Please produce all documents supporting the contentions in this paragraph.

58. Paragraph 76 of the Counter Claim filed against Lisa Barbounis states:

“Barbounis reacted very poorly to Thomas suspending or ending their sexual relationship and protested vehemently against his decision.”

a. Please produce all documents supporting the contentions in this paragraph.

59. Paragraph 85 of the Counter Claim filed against Lisa Barbounis states:

“Barbounis’ threats to Thomas were effective, as Thomas relented and allowed Barbounis to visit him in the United Kingdom once more in Spring of 2019..”

a. Please produce all documents supporting the contentions in this paragraph and specifically documents that support the contention that Lisa Barbounis visited the United Kingdom in Spring 2019.

60. Paragraph 88 of the Counter Claim filed against Lisa Barbounis states:

“After Barbounis’ visit with Thomas in Spring of 2019, Thomas once again terminated their sexual relationship, thwarting a major component of Barbounis’ plans to move to the United Kingdom.”

a. Please produce all documents supporting the contentions in this paragraph and specifically documents that support the contention that Lisa Barbounis planned to move to the United Kingdom and/or that her plan was thwarted.

61. Paragraph 92 of the Counter Claim filed against Lisa Barbounis states:

“The harassment of Bishop by Barbounis also included voice mail messages.”

a. Please produce all documents supporting the contentions in this paragraph and specifically all communications where voice messages were sent or received by Jazmin Bishop to any individual who represented or was acting on behalf of The Middle East Forum. This includes all electronic communications between Jazmin Bishop and Greg Roman, Daniel Pipes, Mark Fink or any attorney retained by MEF.

62. Paragraph 99 of the Counter Claim filed against Lisa Barbounis states:

“Despite prior warnings from Pipes, Barbounis continued to work for Robinson, now out of jail and running for a seat in the European Parliament.”

- a. Please produce all documents supporting the contentions in this paragraph and specifically all documents supporting the contention that Lisa Barbounis continued work for Robinson after Robinson was released from jail.

63. Paragraph 102 of the Counter Claim filed against Lisa Barbounis states:

“As a 501(c)(3) organization, MEF is subject to strict legal controls concerning its use of funds and involvement in political activities. Barbounis’ activities with Robinson violated these controls and threatened to cost MEF its non-profit status.”

- a. Please produce all documents supporting the contentions in this paragraph and specifically all documents supporting the contention that Lisa Barbounis’s “activities with Robinson violated these controls and threatened to cost MEF its non-profit status.”

64. Paragraph 106 of the Counter Claim filed against Lisa Barbounis states:

“On June 5, 2019, Pipes again wrote to Barbounis: “The Guardian article from May 17 has a long, insinuating paragraph about you along with a picture of you. The clear implication is that MEF supports Tommy Robinson’s campaign. This rates as both a surprise and an unwelcome complication. The article could entirely disappear but it could also pop up in the future and make trouble for us. I do not want potential trouble hanging over us, so am displeased. You and I have already discussed the matter of your affiliating MEF too closely with Tommy Robinson and we reached an informal agreement that you would stay away from his efforts. Given this development, I am now imposing a formal limitation on you: No campaign work, even during your private time, without clearance from me.””

- a. Please produce all documents indicating whether MEF suffered any additional trouble in the future after this. Daniel Pipes stated that the article “could entirely disappear but it could also pop up in the future.” Please produce any and all documents indicating whether there was any future issues related to the article or Lisa Barbounis’s presence at the event.

65. Paragraph 106 of the Counter Claim filed against Lisa Barbounis states:

“On July 16, 2019, Barbounis again ignored Pipes’ instructions and used MEF resources to send out political communications in her role as “Director of Communications” for TR.News, where TR stands for Tommy Robinson.”

- a. Please produce all documents indicating that Lisa Barbounis used MEF resources for TR News.

66. Paragraph 106 of the Counter Claim filed against Lisa Barbounis states:

“Upon information and belief, her work in support of Robinson continues to this day.”

- a. Please produce all documents supporting the contention that Lisa Barbounis works in support of Tommy Robinson to this day.

67. Any and all photographs, negatives, recordings and/or video of Plaintiff, Lisa Barbounis that relate in any way to the counterclaims.

DEREK SMITH LAW GROUP, PLLC

BY: /s/ Seth D. Carson
SETH D. CARSON
1835 Market Street
Suite 2950
Philadelphia, PA 19103
Phone: 215.391.4790
Facsimile: 215.893.5288
seth@dereksmithlaw.com

DATED: October 28, 2020

CERTIFICATE OF SERVICE

I hereby certify that on this date that I caused a true and correct copy of Plaintiff's First Set of Interrogatories Addressed to Defendants to be served via email to dwalton@cozen.com and lbenson@cozen.com.

David J. Walton (PA # 86019)
Leigh Ann Benson (PA #319406)
Cozen O'Connor
1650 Market Street, Suite 2800
Philadelphia, PA 19103
P: 215-665-2000
F: 215-665-2013
dwalton@cozen.com
lbenson@cozen.com

Sidney L. Gold sgold@discrimlaw.com.
Sidney L. Gold & Associates P.C.
1835 Market Street, Suite 515
Philadelphia, PA 19103
Tel: (215) 569-1999
Fax: (215) 569-3870
Counsel for The Middle East Forum

DEREK SMITH LAW GROUP, PLLC

BY: /s/ Seth D. Carson
SETH D. CARSON

DATED: October 28, 2020